



William Cafaro, Esq.

Partner

ADMITTED IN NY, CA, MD & TX

Email: bcafaro@cafaroesq.com

Amit Kumar, Esq.

Managing Attorney

ADMITTED IN NY & NJ

Email: akumar@cafaroesq.com

Andrew S. Buzin, Esq.

Of Counsel

ADMITTED IN NY, FL & DC

108 West 39th Street, Suite 602

New York, New York 10018

Telephone: 212.583.7400

Facsimile: 212.583.7401

www.cafaroesq.com

Louis M. Leon, Esq.

Associate

ADMITTED IN NY

Email: lleon@cafaroesq.com

Matthew S. Blum, Esq.

Of Counsel

ADMITTED IN NY

Email: ablum@cafroesq.com

Deena L. Buchanan, Esq.

Of Counsel

ADMITTED IN NM & NJ

June 25, 2020

Via ECF

Hon. Steven L. Tiscione, U.S.M.J.

United States District Court

Eastern District of New York

225 Cadman Plaza East

Brooklyn, NY 11201

Re: Chincha v. Patel
Case No.: 17-cv-06127-ILG-ST

Your Honor:

This firm represents the named Plaintiff Carlos Chincha in the above-referenced action. We write to request that the deadline to file the parties' motion for reconsiderations, which is due today, be extended to **June 30, 2020**.

We need this additional time to finish going over the extensive deposition transcript with our client, with whom we have been unable to meet in person due to the COVID-19 pandemic. Our careful review of this transcript is critical to our motion for reconsideration. Further delaying our ability to submit the motion today, we only recently obtained the transcript from the last discovery hearing. Thus, we request that the Court grant this small extension of the deadline. We also ask that any opposition motions be submitted by **July 10, 2020**.

Prior to making this application, we reached out to defense counsel, Jason Mizrahi, who indicated that he consented to extend the deadlines as proposed above by counsel.

Respectfully submitted,
LAW OFFICES OF WILLIAM CAFARO

/s/
Louis M. Leon (LL 2057)

To: All Counsel *via ECF*